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November 17, 1998

VIA HAND DELIVERY

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Dear Ms. Salas

Submitted on behalf of Noe Corp., L.L.C., licensee of Television Broadcast Station KNOE-TV, Monroe, Louisiana, are an original and four copies of a Petition for Rule Making seeking to amend the Table of Allotments for Digital Television by substituting DTV Channel 7 in place of DTV Channel 55 for use by KNOE-DT.

Any questions concerning this matter should be addressed to undersigned counsel.

Very truly yours

Robert B. Jacobi

Enclosures

BEFORE THE

Federal Communications Commission

In the Matter of	)	
	)	
Amendment of Section 73.622 (b),	)	RM-
Digital Television Table of Allotments,	)	
(Monroe, Louisiana)	)	

To: Chief, Mass Media Bureau

PETITION FOR RULE MAKING

Noe Corp., L.L.C., licensee of Television Broadcast Station KNOE-TV, Monroe, Louisiana ("Petitioner"), through its attorneys and pursuant to Sections 1.419, 1.420 and 73.623 of the Commission's Rules, hereby requests that the Table of Allotments for Digital Television (DTV) Stations, Section 73.622 (b) of the Commission's Rules, be amended as follows:

	Channel No.	
City	Present	Proposed
Monroe, Louisiana	55	7

In support of such request, the following is set forth.

1. Petitioner seeks to substitute DTV Channel 7 in lieu of DTV Channel 55 at Monroe, Louisiana, for use by Station KNOE-TV at the same transmitter site currently used by KNOE-TV for its NTSC operation on Channel 8; DTV Channel 55 was allocated for use by KNOE-TV pursuant to a Sixth Report and Order in MM Docket No. 87-268, 12 FCC Rcd 14588 (1997), recon. granted in part, 13 FCC Rcd 7418 (1998).

2. As set forth in the attached engineering statement of Bernard R. Segal, P.E., the proposed DTV channel substitution is fully consistent with the requirements of Section 73.623 (c) and (d) of the Rules. Specifically, the proposed substitution of DTV Channel 7 at Monroe, Louisiana, would comply with the principal community coverage requirements of Section 73.625 (a) and will not result in more than a two percent (2%) increase in interference to the population served by any other DTV station, DTV allotment or analog TV broadcast station or result in any affected station receiving interference in excess of ten percent (10%) of its population.

3. Accordingly, Petitioner submits that its proposed DTV channel substitution would serve the public interest and the Commission is respectfully requested to issue a Notice of Proposed Rule Making to implement the instant petition.

Respectfully submitted

NOE CORP., L.L.C.

By: _____
Robert B. Jacobi

COHN AND MARKS
1920 N Street, N.W.
Suite 300
Washington, D.C. 20036

Its Attorneys

November 17, 1998

Bernard R. Segal, P.E.
Consulting Engineer
Washington, DC

ENGINEERING STATEMENT PREPARED ON BEHALF OF NOE ENTERPRISES, INC. MONROE, LOUISIANA

The instant Engineering Statement has been prepared on behalf of Noe Enterprises, Inc., licensee of station KNOE-TV, Monroe, Louisiana. Engineering support is provided for a petition to amend the DTV Table of Allotments, Sections 73.622(b) of the Rules. The FCC allotted Ch. 55 for transitional DTV use for KNOE-TV. The instant petition seeks to amend the allotment to Ch. 7.

The proposed Ch. 7 DTV allotment is for operation from the same location as for the current NTSC operation for KNOE-TV. However, as is reflected in a pending application to correct geographic coordinates,* the reference coordinates currently included in the DTV Table of Allotments are to be changed to 32° 11' 50" North Latitude; 92° 04' 14" West Longitude from the currently specified coordinates of 32° 11' 45" North Latitude; 92° 04' 10" West Longitude. Use of either set of coordinates does not alter the conclusionary results. The reference coordinates, 32° 11' 45" North Latitude; 92° 04' 10" West Longitude, have been used herein.

*/ File No. BPCT-980304KE

The antenna radiation center height above average terrain will be 519 meters, corresponding to a radiation center height above mean sea level of 543 meters. Terrain elevations from 3.2-16.1 kilometers along the standard eight radials were obtained from the National Geophysical Data Center 30-second database.

The omni-directional effective radiated power for the new allotment will be 5.0 kW (average).

In compliance with the requirements of Sections 73.623(c), studies are provided which demonstrate that the change in the allotment table as proposed herein satisfies the coverage and allocation criteria of the recited Rule section.

Figure 1 is a map demonstrating the extent of coverage of the 36 dBμ, F(50,90) contour for the proposed allotment. Figure 2 is a tabulation of terrain elevation data and distances to the 36 dBμ, F(50,90) contour for the proposed allotment facilities. Figure 1 demonstrates that the entire community of Monroe would be encompassed and the proposed allotment, therefore, complies with the principal community coverage requirement of Section 73.625(a).

As to allocation concerns, the study provided herein as Figure 3 demonstrates that no NTSC station and no DTV station or allotment would receive interference from the proposed KNOE-DT Ch. 7 facility affecting population in excess of the "de minimis" 2% allowable level and the cumulative interference, where the proposed KNOE-DT facility would cause interference to any NTSC or DTV station, will not exceed the maximum allowable of 10%.

The study of Figure 3 was performed using an FCC matched computer analysis taking into account both NTSC and DTV allocation factors. A computer using an Alpha processor was employed in conjunction with the FCC's FLR software. For each station studied, the reference information from Appendix B of the Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order in MM Docket Number 87-268 is listed in Figure 3 for comparison with the results obtained independently using the Alpha processor with the FCC's FLR software. The independently determined calculation results are in good agreement with the FCC's Appendix B results.

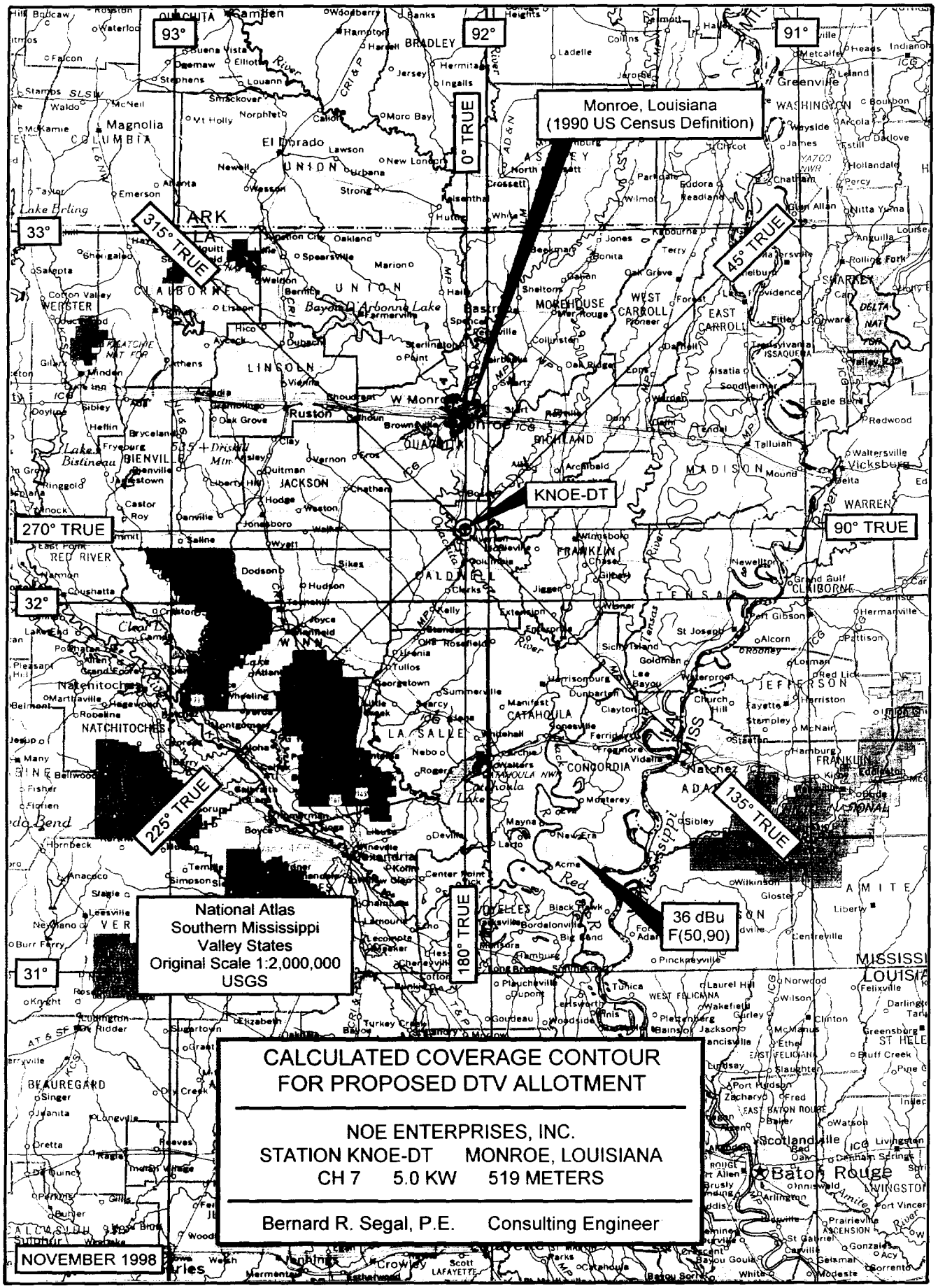
Two studies were performed. The first study took into account the current Appendix B allotment facilities and provided a reference for comparison with the second study which included the effect of the proposed new Ch. 7 DTV allotment for paired use with KNOE-TV. In no instance would the FCC allowable 2% de minimis interference level be exceeded toward any NTSC station or DTV allotment, and in no instance where the proposed KNOE-DT facility would cause interference would the maximum cumulative 10% allowable interference limit be exceeded to any NTSC station or DTV allotment. The proposed allotment satisfies all FCC criteria.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 17, 1998.

Bernard R. Segal, P.E.

Bernard R. Segal, P.E.

Figure 1


Monroe, Louisiana
(1990 US Census Definition)
KNOE-DT
93°
92°
91°
33°
31°
32°
0° TRUE
45° TRUE
90° TRUE
135° TRUE
180° TRUE
225° TRUE
270° TRUE
315° TRUE
36 dBu
F(50,90)
National Atlas
Southern Mississippi
Valley States
Original Scale 1:2,000,000
USGS
CALCULATED COVERAGE CONTOUR
FOR PROPOSED DTV ALLOTMENT
NOE ENTERPRISES, INC.
STATION KNOE-DT MONROE, LOUISIANA
CH 7 5.0 KW 519 METERS
Bernard R. Segal, P.E. Consulting Engineer
NOVEMBER 1998
10 0 20 40 60 80 100 MILES
10 0 50 100 150 KILOMETRES

ENGINEERING STATEMENT
PREPARED ON BEHALF OF
NOE ENTERPRISES, INC.
MONROE, LOUISIANA

Proposed Monroe, Louisiana DTV
Channel 7 5.0 kW 519 m

Tabulation of Average Elevations and Distances
to the DTV Coverage Contour

Site Coordinates: 32° 11' 45"
92° 04' 10"

Azimuth (Deg. T.)	3.2-16.1 km Terrain Average (mAMSL)	Rad. Ctr Above Terrain Average (m)	Distance to 36 dBμ, F(50,90) DTV Coverage Contour (km)
0	18	525	102.7
45	14	529	103.0
90	13	530	103.1
135	13	530	103.1
180	26	517	102.1
225	46	497	100.7
270	43	500	100.9
315	22	521	102.5
Overall average	24	519	

ENGINEERING STATEMENT
PREPARED ON BEHALF OF
NOE ENTERPRISES, INC.
MONROE, LOUISIANA

NTSC and DTV Allocation Studies for Proposed KNOE-DT, Allotment
Ch. 7, 5.0 kW, 519 mAAT

NAD 27 Site Coordinates: 32° 11' 45" North Latitude
92° 04' 10" West Longitude

Antenna Radiation Center: 543 mAMSL

A: NTSC Allocation Study

Ch. Relation-ship*	Potentially Affected NTSC Station	Appendix B Data		Independent Calculations					
		Current Service Pop. (Thous)	Allotted DTV Interf. (%)	Current Service Pop. (Thous)	Noise-Limited Pop. (Thous)	Allotted DTV Interf (Thous)	Allotted DTV Interf (%)	New Interf. from Prop. KNOE-DT (Thous)	New Interf. from Prop. KNOE-DT (%)
n-0	KATV, Little Rock, AR Ch. 7, 316 kW, 591 m	949	0.0	944	961	0	0.0	4	0.4
n-0	KPLC, Lake Charles, LA Ch. 7, 316 kW, 451 m	940	0.0	940	951	0	0.0	19	2.0
n-0	WDAM-TV, Laurel, MS Ch. 7, 316 kW, 155 m	328	0.0	328	329	0	0.0	2	0.6
n-0	KLTV, Tyler, TX Ch. 7, 316 kW, 302 m	619	0.0	611	686	0	0.0	0	0.0
n+1	KNOE-TV, Monroe, LA Ch. 8, 316 kW, 576 m	688	0.8	673	714	2	0.3	0	0.0
n+1	WFAA-TV, Dallas, TX Ch. 8, 316 kW, 512 m	4,161	0.0	4,155	4,223	0	0.0	0	0.0

*n=DTV Ch. 7

Figure 3
Sheet 1 of 2

B: DTV Allocation Study

Ch. Relation-ship*	Potentially Affected DTV Station	Appendix B Data: DTV Service Pop. (Thous)	Appendix B Data: NTSC Service Pop. (Thous)	Appendix B Data: DTV/NTSC Pop. Match (%)	Independent Calculations: DTV Service Pop. (Thous)	Independent Calculations: NTSC Service Pop. (Thous)	Independent Calculations: DTV/NTSC Pop. Match (%)	Independent Calculations: New Interf from Prop. KNOE-DT (Thous)	Independent Calculations: DTV/NTSC Pop. Match with Prop. KNOE-DT (%)
n-0	Prop. Allotment Monroe, LA Ch. 7, 5.0 kW, 519 m	—	—	—	540	673	80.2	—	—
n+1	Allotment, Lake Charles, LA Ch. 8, 3.2 kW (MAX-DA), 451 m	749	940	79.7	751	940	79.9	0	79.9

*n=DTV Ch. 7